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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LAUREN L. LAVOIE, individually; LAUREN
L. LAVOIE, as Guardian and Natural Parent of
L.S., a Minor,

Plaintiffs,

vs.

HYUNDAI MOTOR AMERICA, a Foreign
Corporation; HYUNDAI MOTOR COMPANY,
a Foreign Corporation; DOES I-X; ROES
CORPORATIONS I-XI, inclusive,

Defendants.

CASE NO.: 2-22-cv-00628-GMN-MDC

STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
DEADLINES

[FIRST REQUEST]

COMES NOW, Plaintiff LAUREN L. LAVOIE, individually, and as Guardian and
Natural Parent of L.S., a Minor, by and through her attorneys of record, the law firm
CHRISTIANSEN TRIAL LAWYERS, and Defendants HYUNDAI MOTOR COMPANY and
HYUNDAI MOTOR AMERICA, by and through their counsel of record, the law firm
BOWMAN AND BROOKE, LLP and the law firm of MARIO D. VALENCIA, ATTORNEY
AT LAW, LLC, and hereby stipulate to extend discovery deadlines set forth in the Stipulated
Discovery Plan and Scheduling Order (ECF No. 65). The parties' stipulation is supported by the
following:

CHRISTIANSEN
— TRIAL LAWYERS —



I. Discovery Completed to Date.

The parties have completed the following discovery:

- The parties have conducted a FRCP 26(f) conference on July 19, 2024;
- Plaintiff and Defendant Hyundai Motor America have served their respective FRCP 26(a) disclosures;
- Defendants Hyundai Motor America and Hyundai Motor Company have served written discovery to Plaintiff. Plaintiff has responded to the same;
- Plaintiff propounded written discovery on Defendants Hyundai Motor America and Hyundai Motor Company. The deadline for Defendants to serve responses has not yet passed;
- Plaintiff supplemented her FRCP 26(a) disclosures;
- Defendant Hyundai Motor America supplemented its FRCP 26(a) disclosures;
- Plaintiff provided provider specific authorizations pursuant to this Court's order on November 20, 2024; and
- The following depositions have been completed:
 1. Sharon Lavoie;
 2. Leslie Aspillaga;
 3. Kenneth Harding; and
 4. Officer James LaRose

II. Discovery That Remains to be Completed.

- FRCP 26(a) disclosures from Defendant Hyundai Motor Company including confidential technical documents upon entry of a protective order, which is being prepared;
- Defendant's responses to Plaintiffs' written discovery requests which are not yet due;
- Continued supplements to Defendant Hyundai Motor America's FRCP 26(a) disclosures;
- Disclosure of expert witnesses and rebuttal witnesses by all parties;
- Deposition of Defendant Hyundai Motor America FRCP 30(b)(6);

- Deposition of Defendant Hyundai Motor Company FRCP 30(b)(6);
- Deposition of Plaintiff Lauren Lavoie;
- Deposition of witness Christopher Stone;
- Depositions of lay witnesses;
- Depositions of expert witnesses;
- Receipt of medical records from Plaintiff Lauren Lavoie's previous medical providers;
- and,
- Depositions of treating medical providers.

III. Reasons for Extension.

Good cause supports the requested extension. Counsel has been working diligently to adhere to the current discovery deadlines but each side has additional fact discovery they wish to complete before expert discovery, and jointly seek an extension of all discovery deadlines by one-hundred and twenty (120) days. Defendant Hyundai Motor Company is headquartered outside of the United States and, to date, has not disclosed any confidential documents pertaining to this case. Plaintiffs contend that they cannot proceed with FRCP 30(b)(6) depositions of Defendants Hyundai Motor Company and Hyundai Motor America and expert disclosures without the documents they requested in written discovery. By agreement of the parties at the initiation of this lawsuit, Defendants shall have a total of ninety (90) days to respond to written discovery because much of the information to be disclosed by Defendants will come from Korea. Plaintiffs further contend they require Defendants' written discovery responses and confidential document production before taking depositions of material defense witnesses and retention of expert witnesses.

Defendants have not been able to locate witness Christopher Stone whom Plaintiffs have identified as a fact witness and who reportedly serviced the vehicle the day before the crash. Defendants wish to depose Mr. Stone before its expert disclosures because the vehicle was spoliated before Defendants could inspect it, and Mr. Stone has first-hand knowledge of the vehicle and the condition of the vehicle at the time of the crash. Defendants attempted to serve Mr. Stone at his last known address three times and Plaintiff Lauren Lavoie does not have his



current address. He is thought to reside at a half-way home, and Defendants are continuing to attempt to serve him at this time. Ms. Lavoie's deposition has also been delayed due to a discovery dispute regarding the discoverability of Plaintiff Lauren Lavoie's prior medical records. Magistrate Couvillier ordered Plaintiffs to provide HIPAA releases to Defendants which Defendants received on November 20, 2024; however, Defendants are still awaiting Plaintiffs' prior medical records, which are required prior to deposing Ms. Lavoie. Defendants wish to depose Ms. Lavoie before submitting its expert disclosures.

The parties now jointly seek to extend the deadline for the close of discovery by one hundred and twenty (120) days, from April 7, 2025 to August 5, 2025, and to adjust all case deadlines accordingly. This request is made in good faith and not for delay.

IV. Proposed Schedule for Completing all Remaining Discovery:

The parties propose the following extensions of deadlines:

Discovery Deadline	Current Deadline	Proposed Deadline
Close of Discovery	April 7, 2025	August 5, 2025
Amending Pleadings and Adding Parties	November 25, 2024	March 25, 2025
Plaintiffs' Initial Expert Disclosures	November 25, 2024	March 25, 2025
Defendants' Expert Disclosures	January 9, 2025	May 9, 2025
Defendants' Rebuttal Expert Disclosures	January 9, 2025	May 9, 2025
Interim Status Report	February 6, 2025	June 6, 2025
Plaintiffs' Rebuttal Expert Disclosures	February 24, 2025	June 24, 2025
Dispositive Motions	May 7, 2025	September 4, 2025
Joint Pre-Trial Order (if no dispositive motions)	June 6, 2025	October 3, 2025

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1 **IT IS SO STIPULATED.**

2 DATED this 22nd day of November, 2024. DATED this 22nd day of November, 2024.

3 CHRISTIANSEN TRIAL LAWYERS BOWMAN AND BROOKE LLP

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5
6 /s/ Whitney J. Barrett, Esq.
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15 **ORDER**

16 IT IS SO ORDERED as stipulated by the parties.

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20 Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
Dated: 11/25/2024
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